

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

BRITTNEY GOBBLE PHOTOGRAPHY,  
LLC,

*Plaintiff,*

v.

SINCLAIR BROADCAST GROUP, INC.,  
*et al.*,

*Defendants.*

Case No. 1:18-cv-03403-SAG (Lead Case)

Case No. 1:18-cv-03384-SAG

Case No. 1:19-cv-00559-SAG

Case No. 1:19-cv-00606-SAG

**PLAINTIFF BRITTNEY GOBBLE  
PHOTOGRAPHY, LLC'S CONSENT  
MOTION FOR LEAVE TO FILE  
SECOND AMENDED COMPLAINT**

**PLAINTIFF BRITTNEY GOBBLE PHOTOGRAPHY, LLC'S CONSENT MOTION  
FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

Plaintiff Brittney Gobble Photography, LLC ("Gobble") hereby moves the Court for leave to file its Second Amended Complaint, pursuant to Fed. R. Civ. P. 15(a)(2). Filed simultaneously with this Motion are the proposed Second Amended Complaint and the proposed Second Amended Complaint with the changes noted as required by L.R. 103(6)(c).

Plaintiff has provided clean and redlined versions of the Second Amended Complaint to counsel for Defendants and has conferred with Defendants. Defendants consent to the filing of the Second Amended Complaint.

Plaintiff has prepared the Second Amended Complaint mainly for the purposes of streamlining the case and eliminating many Defendants, particularly those that do not hold any substantial assets except for the station's FCC license. Plaintiff has also added some factual allegations that have developed over the course of discovery.

Therefore, Plaintiff respectfully requests that the Court permit the filing of the Second Amended Complaint attached hereto as Plaintiff's operative complaint.

December 8, 2020

Respectfully submitted,

By: /s/ Robert E. Allen  
Robert E. Allen

C. Justin Brown  
Maryland State Bar No. 28110  
[brown@cjbrownlaw.com](mailto:brown@cjbrownlaw.com)  
Brown Law Firm  
1 N. Charles St., Suite 1301  
Baltimore, Maryland 21201  
Telephone: (410) 244-5444  
Facsimile: (410) 934-3208

C. Dale Quisenberry (admitted *pro hac vice*)  
Texas State Bar No. 24005040  
[dale@quisenberrylaw.com](mailto:dale@quisenberrylaw.com)  
Quisenberry Law PLLC  
13910 Champion Forest Drive, Suite 203  
Houston, Texas 77069  
Telephone: (832) 680-5000  
Facsimile: (832) 680-5555

Robert E. Allen (admitted *pro hac vice*)  
Cal State Bar No. 166589  
[rallen@glaserweil.com](mailto:rallen@glaserweil.com)  
Thomas P. Burke Jr. (admitted *pro hac vice*)  
[tburke@glaserweil.com](mailto:tburke@glaserweil.com)  
Glaser Weil Fink Howard Avchen & Shapiro LLP  
10250 Constellation Blvd., 19th Fl.  
Los Angeles, CA 90067  
Telephone: (310) 282-6280

*Counsel for Brittney Gobble Photography, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on this 8th day of December 2020, a copy of the foregoing document was filed electronically. Notice of the filing will be sent to all parties who have appeared by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Robert E. Allen  
Robert E. Allen